

**From:** [Hannan, Michael](#)  
**To:** [Braganza, Bonnie](#)  
**Cc:** [LeDoux, Erica](#); [Myers, Robert](#)  
**Subject:** Question regarding using FIP to obtain synthetic minor source status  
**Date:** Tuesday, June 05, 2018 4:46:26 PM  
**Attachments:** [image001.png](#)  
[image016.png](#)  
[image017.png](#)  
[image018.png](#)  
[image019.png](#)  
[image020.png](#)  
[image021.png](#)

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Hello Bonnie,

As a follow-up to our phone call today, Williams Four Corners is submitting a question regarding whether or not the FIP registration can be utilized to establish practicably enforceable conditions so that the facility can be a synthetic minor source for Title V without permitting through the minor source program? For example, with the Ojito Compressor Station, can we submit a FIP registration in which we use catalytic converters on the engines such that controlled CO emissions are less than 100 tpy, thus avoiding Title V, and have the registration act to provide the practicably enforceable condition requiring the catalysts? Or must we submit a minor source application for this practicably enforceable condition?

If you need any further clarifications just let us know.

Best regards,  
Mike

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